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UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

REYNALDO MARTINEZ,

Plaintiff,

vs.

COMCAST CORPORATION

Defendant.

CASE NO.: CV-13-00878-RS

ORDER

STIPULATION OF THE PARTIES TO
EXTEND DATES FOR EXPERT
DISCLOSURE AND EXPERT AND NON-
EXPERT DISCOVERY CUT-OFF.

Court: Courtroom 3, 17th Flr.
Judge: Hon. Richard Seeborg
Trial Date: August 11, 2014

Pursuant to Local Rules 6-2 and 7-12, Plaintiff Reynaldo Martinez and Defendant Comcast Corporation hereby stipulate and request as follows:

Whereas the parties were supposed to have a settlement conference with Magistrate Paul S. Grewal in September of 2013 and held off on conducting most discovery until the settlement conference was held, and given that the parties were not able to have a settlement conference with Judge Grewal until January 15, 2014 due to the judge's busy schedule; and

Whereas the parties have had difficulty completing the doctors' depositions due to their busy schedules, and the parties have not completed all of the depositions necessary to prepare for trial and have had recent further productions of documents,

Whereas the parties have not requested any previous extensions of time with the court and Good Cause appearing, the parties seek the following extensions of time in order to prepare for trial:

1. The Court's current deadlines are:

- | | |
|---------------------------------------|----------------|
| a. Expert Disclosure: | April 4, 2014 |
| b. Supplemental and Rebuttal Experts: | April 25, 2014 |
| c. Expert Discovery cut-off: | May 16, 2014 |
| d. Non-Expert Fact Discovery cut-off: | May 16, 2014 |

7. Under the stipulated extension, these deadlines would become:

- | | |
|---------------------------------------|---------------|
| a. Expert Disclosure: | May 5, 2014 |
| b. Supplemental and Rebuttal Experts: | May 26, 2014 |
| c. Expert Discovery cut-off: | June 16, 2014 |
| d. Non-Expert Fact Discovery cut-off: | June 16, 2014 |

Therefore, the parties request an order adopting these amended dates for expert disclosure and expert and non-expert discovery cut-off.

IT IS SO STIPULATED.

STIPULATION OF THE PARTIES TO EXTEND DATES
FOR EXPERT DISCLOSURE AND EXPERT AND NON-
EXPERT DISCOVERY CUT-OFF AND
PROPOSED ORDER

1
2
3 DATED: LAW OFFICES OF DANIEL RAY BACON

4 April 2, 2014

/s/ Daniel Ray Bacon

5 DANIEL RAY BACON
6 ATTORNEYS FOR PLAINTIFF

7
8 DAVIS WRIGHT TREMAINE LLP

9 DATED:

/s/ Anne Dahlgren

10 April 2, 2014

11 ANN DAHLGREN
12 JUDITH DROZ KEYES
13 ATTORNEY FOR DEFENDANT
14 COMCAST

15 SIGNATURE ATTESTATION

16 I, Daniel Ray Bacon, attest that I obtained the concurrence of Ann Dahlgren in filing this
17 document. I declare under penalty of perjury of the laws of the United States that the foregoing
18 is true and correct.

19
20 Dated: April 2, 2014.

/s/ Daniel Ray Bacon

21 DANIEL RAY BACON
22 PLAINTIFF'S COUNSEL
REYNALDO MARTINEZ

23 PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS ORDERED THAT
24 THE CASE MANAGEMENT ORDER BE AMENDED WITH THE FOLLOWING
25 CHANGES:

26 a. Expert Disclosure:

May 5, 2014

27 STIPULATION OF THE PARTIES TO EXTEND DATES
28 FOR EXPERT DISCLOSURE AND EXPERT AND NON-
EXPERT DISCOVERY CUT-OFF AND
PROPOSED ORDER

b. Supplemental and Rebuttal Experts: May 26, 2014
c. Expert Discovery cut-off: June 16, 2014
d. Non-Expert Fact Discovery cut-off: June 16, 2014

DATED: 4/3/14



HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT COURT JUDGE
NORTHERN DISTRICT OF CALIFORNIA

STIPULATION OF THE PARTIES TO EXTEND DATES
FOR EXPERT DISCLOSURE AND EXPERT AND NON-
EXPERT DISCOVERY CUT-OFF AND
PROPOSED ORDER